

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. No. 3:23-cv-30115-MGM

MIGUEL SANCHEZ MALDONADO, on
behalf of himself and all others similarly
situated

Plaintiff,

v.

SOUND SEAL INC.,

Defendant.

**ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO FILE AN
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Sound Seal Inc. ("Sound Seal") hereby moves, pursuant to [Fed. R. Civ. P. 6\(b\)](#), this Court for a fourteen (14) day extension of time up to and including February 26, 2024, to answer, move, or otherwise respond to the complaint. As grounds for this motion, Defendant states as follows:

1. Plaintiff filed the complaint in this matter on October 27, 2023.
2. Plaintiff sent Sound Seal a Waiver of Service of Summons on November 13, 2023. Sound Seal agreed to waive service of summons under [Fed. R. Civ. P. 4\(d\)](#), and therefore was required to respond to the complaint by January 12, 2024.
3. On December 12, 2023, this Court granted Sound Seal's Assented-To Motion for Enlargement of Time to File an Answer or Otherwise Response to Plaintiff's Complaint. Pursuant to this Court's order, Sound Seal has until February 14, 2024 to answer, move, or otherwise respond to the complaint.

4. The parties have conferred and agree that providing Sound Seal an additional fourteen days to respond would serve the interests of the parties. To date, the parties have voluntarily exchanged information and documents and are in ongoing discussions to potentially resolve Plaintiff's claims. As a result, the parties would like to have the additional time to continue their discussions to potentially resolve Plaintiff's claims.

5. This is the second request for an extension of time in this matter.

WHEREFORE, the parties request that the Court grant this assented-to motion and extend the date for Sound Seal to respond to the complaint until February 26, 2024.

Assented to by:

MIGUEL SANCHEZ MALAONADO, on
behalf of himself and all others similarly
situated,
By his attorney,

/s/ Raymond Dinsmore
Raymond Dinsmore (BBO #667340)
Hayber, McKenna & Dinsmore, LLC
One Monarch Place, Suite 1340
Springfield, MA 01144
rdinsmore@hayberlawfirm.com

William G. Madsen (*pro hac vice*)
Madsen, Prestley & Parenteau, LLC
402 Asylum Street
Hartford CT 06103
Tel. (860) 246-2466
Fax (860) 246-1794
wmadsen@mppjustice.com

SOUND SEAL INC.
By its attorneys,

/s/ Kurt B. Fliegauf
Kurt B. Fliegauf (BBO #564329)
Brendan P. Kelley (BBO #689071)
CONN KAVANAUGH ROSENTHAL
PEISCH & FORD, LLP
One Federal Street, 15th Floor
Boston, MA 02110
kfliegauf@connkavanaugh.com
bkelley@connkavanaugh.com

Courtney J. Peterson (*pro hac vice*)
Bryan Cave Leighton Paisner LLP
1290 Avenue of the Americas
New York, NY 10104
Courtney.peterson@bclplaw.com

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(a)(2), the undersigned conferred with counsel for Plaintiff and Plaintiff assents to this motion.

/s/ Brendan P. Kelley
Brendan P. Kelley

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filings to all parties who have appeared and registered with CM/ECF.

/s/ Brendan P. Kelley
Brendan P. Kelley